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November 8, 2022

Via ECF

Hon. Esther Salas, U.S.D.J.
Hon. James B. Clark III, U.S.M.J.
U.S. District Court for the District of New Jersey
Martin Luther King Building & U.S. Courthouse
50 Walnut St. | Newark, New Jersey 07102

Re: Palisades Capital, Inc. v. Muijrers et al., Index # 21-CV-20054 (ES-JBC)

Dear Judge Salas and Judge Clark:

I represent the Plaintiff, Palisades Capital, Inc., in the above-referenced case. I am writing regarding 2 issues:

- 1) Following the phone conference on October 12, Judge Clark entered a Letter Order (Docket #55) permitting Plaintiff to file a motion for leave to file an amended Complaint by November 4. Plaintiff has decided not to amend the Complaint at this time.
- 2) Regarding the fully briefed motion to vacate the entry of default against Defendant Techie Hosting, Inc., Plaintiff respectfully requests that the Court go ahead and decide this motion on the merits. Plaintiff's position that the default against Techie Hosting should stand is fully briefed in our motion papers. Procedurally, the Clerk entered default against Techie Hosting on August 9 (Docket #27) after Plaintiff filed a request for default on August 5 (Docket #26). The Court directed Plaintiff on August 10 to file a brief in support of its request for default (Docket #28). Techie Hosting then filed a motion to vacate the entry of default on August 17 (Docket # 29), fully briefed as of September 12 (Docket #s 32 and 33), and Plaintiff also submitted a brief in support of its motion for default judgment, as directed by the Court, on September 23 (Docket #s 39 & 40). The Letter Order in Docket #55 administratively terminated Plaintiff's motion for default judgment against Defendant Techie Hosting, Inc. (Docket #39), however Plaintiff had submitted motion papers along with this motion. **Plaintiff respectfully requests that the Court consider its papers filed in Docket #39 & Docket #40, in addition to Plaintiff's opposition papers filed in Docket #32, when deciding Techie Hosting's motion to vacate the entry of default (Docket #29).**

Respectfully,

Maria Isabel S. Guerrero

Maria Isabel S. Guerrero, Esq.